US Bureau of Reclamation
CALFED Admin Draft Comments
**Analytical Issues**

**A.** **Modeling**
* No Validation (hydrodynamic)
* Combination of CVP & SWP Power
* No reflection of changed Delta configuration

Recommendation: Revise document to separate power impacts between CVP and SWP, acknowledge that results do not reflect any changed configuration of Delta conveyance, and identify a process to complete and report model validation results in the final document.

**B.** **Assumptions**
* Flood restrictions - not included in modeling
* Temperature - assumed to not reduce flexibility of operations
* ERPP - dependency on water from unknown sources
* Common programs - no assessment in conveyance analysis; not fully developed; assumption that goals will be met
* CVPIA actions - role of (b)(2) in modeling
* Salinity - no reflection of different Delta configurations; Suisun Marsh
* No change in standards - no reflection of different Delta configurations

Recommendation: Revise document to acknowledge these (and other) assumptions and uncertainties. Include a discussion in the draft to assess the validity and significance of these assumptions as well as an approach to confirm or modify assumptions in the time between draft and final.

**C.** **Display of Results**
* Tables appear biased, summaries are hard to follow, information is unbalanced
* Little Dot evaluation is too subjective

Recommendation: Eliminate the tables or revise them to be a more complete representation of information presented in a balanced and unbiased tone, with articulation of the unknowns/holes.

**D.** **Impact Assessment**
* Lack of analysis or discussion to support stated determinations
* Common Programs - difficult to assess without more definition

Recommendation: Revise document to acknowledge unknowns and include a process to resolve issue in the time between draft and final.

**E.** **Adaptive Management**
* No consensus definition
* HUGE reliance on this unknown

Recommendation: Revise document to acknowledge the unknowns with this approach and include a process to resolve this issue in the time between draft and final.